



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

June 22, 2011

STOP SALE, USE, OR REMOVAL ORDER

Attention: Wes Long
Douglas Products and Packaging, LLC.

Address: 1550 East Old State Route 210
Liberty, MO 64068

Docket Number: FIFRA-06-2011-320

The U.S. Environmental Protection Agency Region 6 (EPA) has determined that the sale or distribution (importation) of the product, Drex- PH3 Pellets (EPA Reg. No. 19713-569), is in violation of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). The distribution or sale to any person of any pesticide which is misbranded is an unlawful act as described in Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E). The product is in violation of FIFRA due to the product's label differing from EPA approved label.

By the authority of Section 13(a) of the FIFRA, 7 U.S.C. § 136k(a), and the delegation of such authority, Douglas Products and Packaging, LLC. , is hereby ordered not to sell, use, distribute, or remove the product, Drex- PH3 Pellets (EPA Reg. No. 19713-569), except as provided below. The prohibition in this Stop Sale, Use, or Removal Order (Order) pertains to a 6594 kg shipment (4396- 1.5 kg containers) of Methyl Drex- PH3 Pellets (EPA Reg. No. 19713-569) which Douglas Products and Packaging, LLC. imported into the United States on or about June 14, 2011.

The product can only be further distributed as provided below:

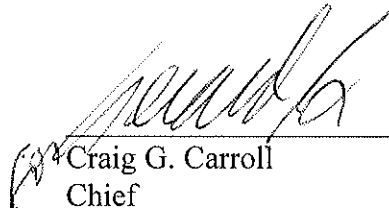
1. The product can be exported out of the country immediately;

OR

2. The importer must take ALL of the following steps:

- a) the misbranded product is relabeled at EPA Est. No. 1015-MO-001 to be relabeled, in accordance with regulations;
- b) proof of the labeling is provided to EPA (photos of several products would be acceptable); and
- c) the importer understands that the importation of these unregistered pesticides are a violation of FIFRA which subjects them to civil penalties.

This Order is effective immediately upon receipt, shall remain in effect until the product has been exported or re-labeled, the requested information has been provided to EPA, and EPA has issued a Release of the Order. Any person violating the terms or provisions of this Order shall be subject to penalties prescribed by Section 14 of FIFRA, 7 U.S.C. § 136l. This Order does not preclude EPA from pursuing other enforcement actions related to this or any other case.



Craig G. Carroll
Chief
Pesticides Section